

SPU Water Operations Control Center (OCC)

City of Seattle Response to Request for Information Regarding the Harbor Island Superfund Site, East Waterway Operating Unit

D. QUESTIONS

1. Identification and Association with Subject Property

- a. Provide the full legal name and mailing address of Respondent.

City of Seattle
c/o William Devereaux
Director, Environmental Management and Real Estate Division
Seattle City Light
700 5th Avenue, Suite 3316
P.O. Box 34023
Seattle, Washington 98124-4023

- b. For each person answering these questions on behalf of Respondent, provide that person's:
- i. full name;
 - ii. title;
 - iii. business address and electronic mail address; and
 - iv. business telephone number.

Anne Gettel
Senior Paralegal, Environmental Section
Seattle City Attorney's Office
701 Fifth Avenue, Suite 2050
Seattle, WA 98104-7095
206-615-1317

- c. If Respondent wishes to designate an individual for receiving future correspondence from the EPA concerning the EWOU, please indicate so here by providing that individual's name, mailing address, electronic mail address, telephone number, and fax number.

Pete Rude
Senior Sediment Scientist
Seattle Public Utilities
700 5th Avenue, Suite 4900
Seattle, WA 98104-4018
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206-733-9179
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- d. Provide the address of each Subject Property, the time period when Respondent held any ownership or other interest in the Subject Property, and the type of interest held.

The City acquired the SPU Water Operations Control Center (OCC) property in several portions between the years of 1907 and 2012.¹ Known addresses for the site are 2700 Airport Way S, 918 S Lander St, and 2701 Airport Way S.²

- e. Identify all materials used or created by Respondent's activities or operations at each Subject Property.

The City has limited information on the materials handled or used at the property from 1907 to the 1980s.

Records show that since at least 1924, oil and fuel has been used and handled at the property.³ Engineering plans developed in 1925 show that materials used to construct a shop and warehouse on the property included concrete, wood, tile, and iron roofs.⁴ Photos from the 1920s show indoor and outdoor storage areas of pipes, hydrants, and other water department pipe materials.⁵

Since the 1930s, water pipes and other materials were stored in outdoor and indoor storage areas.⁶ In 1935, the Water Department began using copper pipe.⁷

Records from the 1970s indicate the use of petroleum products (fuel and oil) and paint in operations at the property.⁸ Treated timber piles were used to support the floor of the new property structures that were built in the 1970s.⁹

From an unknown time until 1986, herbicide was used at the property.¹⁰ Since the 1980s, many other products, chemicals, and wastes have been used or handled at the

¹ SEA EWW_00013104-all, PMA Property Detail Report; SEA EWW_00012991-all, Ordinance 15229, providing for the purchase of block 231, 1907; SEA EWW_00013020-all, Ordinance 53152, acquisition of Block 18, Hanford's Addition, 1927; SEA EWW_00013028-all, Ordinance 53487, acquisition of portions of Lots Seven 7 and 8, 1927; SEA EWW_00013036-all, Ordinance 53635, accepting a deed of conveyance from Pioneer Lumber, 1927; SEA EWW_00013056-all, Ordinance 74976, accepting a deed from Allen M. Sherman, 1946; SEA EWW_00013060-all, Ordinance 98173, acquisition of Bay Side Addition, 1969; SEA EWW_00013072-all, Ordinance 99439, acquisition of Block 229, 1969.

² SEA EWW_00013104-all, PMA Property Detail Report.

³ SEA EWW_00010676, 44-57-1, Engineering Plan showing Oil Station & Auto Shed, 1924.

⁴ SEA EWW_00010676, 44-57-1, Engineering Plan showing Oil Station & Auto Shed, 1924.

⁵ SEA EWW_00003027, Photo – outdoor storage, 1929; SEA EWW_00003035, Photo – south shop & outdoor storage, 1929; SEA EWW_00003283, Photo – shops, 1929; SEA EWW_00003312, Photo – indoor & outdoor storage, 1929; SEA EWW_00003283, Photo - buildings with cover.

⁶ SEA EWW_00003305, Photo – outdoor storage, 1930; Photo, Old City Light south shops, 1936.

⁷ SEA EWW_00002824, Photo – first delivery of copper pipe, 1935.

⁸ SEA EWW_00013276, at SEA EWW_00013277 (2), South Water Dept MTD Shop, 1970; SEA EWW_00012801, Intra-Department Correspondence re Heat system for sprain paint booth, 1973.

⁹ SEA EWW_00012810 (1), Intra-Department Correspondence, New South Shop Facility, 1970.

¹⁰ SEA EWW_00012823, Letter and profile sheet for herbicide, 1986.

facility. See the City's response to 1.m for more information on those products and materials.

Currently, materials stored and handled at the facility include pipes, valves, hydrants, and recyclables, including metals, wood, and mixed recycling.¹¹ Water crews load trucks with materials and supplies needed to tap water mains for new/revised services, launch pipeline and meter repairs, maintain hydrant valves, and address pump station equipment issues.¹²

- f. Provide copies of all documents regarding the ownership or environmental conditions of the Subject Property, including, but not limited to, deeds, sales contracts, leases, surveys, investigations, sampling, reports, blueprints, "as-builts," and photographs.

Responsive documents have been produced and indexed.

- g. Provide information on the condition of the Subject Property when purchased or at the beginning of the relevant time period; describe the source, volume, and content of any fill used during the construction of the buildings, including waterside structures such as seawalls, wharves, docks, or marine ways.

In 1907, when the City acquired the property, the site was vacant land and tidal flats.¹³ In 1921 and 1923, fill was placed on portions of the property.¹⁴ The contents of the fill are unknown. Correspondence in 1970 indicates that structural fill was used to create the desired final grade for the completion of a new building foundation.¹⁵ The contents of this fill are also unknown.¹⁶

The site is not located adjacent to the EWW, and no water-related structures exist at this property.

- h. Describe the activities or operations at each Subject Property including:
 - i. the date such activities or operations commenced and concluded; and

See the response to h.ii. below.

¹¹ SEA EWW_00006093, at SEA EWW_00006091 (10), Draft Supplemental Investigation Report, 2018.

¹² Pers. Comm. w/J. Ovitt, 1/27/2022.

¹³ SEA EWW_00013008-all, Ordinance 16749, purpose of erecting City Stables, 1907; SEA EWW_00012562-all, Correspondence re placement of fill, 1921.

¹⁴ SEA EWW_00012562-all, Correspondence re placement of fill, 1921; SEA EWW_00012571-all, Correspondence re Puget Sound Bridge & Dredging Co to fill site, 1923.

¹⁵ SEA EWW_00012861, at SEA EWW_00012862 (2), Letter re test borings and fill, 1970.

¹⁶ SEA EWW_00012861, at SEA EWW_00012862 (2), Letter re test borings and fill, 1970.

- ii. the types of activities or operations performed at each Subject Property, including but not limited to the use, storage, or disposal of any materials in an outdoor location.

1907 to 1970: Historical Operations

In 1907, the City acquired the property and shortly after erected stables.¹⁷ It is unknown how long stables were in use on the property. A fire occurred in 1924 that burned down a property building and possibly additional facilities.¹⁸ The City has not located any additional information on activities at the site between 1907 and 1924.

Engineering plans developed in 1924 and 1925 show that an oil station with a gas pump, an auto shed, and warehouse were to be constructed on the property.¹⁹ In 1924, the City also initiated a contract with Northern Pacific Railway for the operation of a rail track.²⁰ In the 1920s, the OCC facility also consisted of a meter shop, office space, and indoor and outdoor storage areas containing pipes, hydrants, and other Water Department pipe materials.²¹

Photos from the 1930s also show outdoor and indoor storage areas containing water department pipes and other materials.²² In 1935, the facility received its first delivery of copper pipe.²³ In 1936, a building was “razed” by the City. A 1936 photo of the site shows a tower that may contain electrical equipment.²⁴

Records from the 1940s and 1950s are unavailable, but it is likely operations were similar to those described below.

~1960s to Present – Current Operations

The property has operated as a control center for the Water Department of Seattle Public Utilities for several decades.²⁵ Facilities used by the Water Department over many years include the following: Carpentry Shop, Pipe Shop, Meter Shop, Electrical Shop, Oil Station, Motor Transport Division (MTD) Shop, Machine Shop, spray paint booth,

¹⁷ SEA EWW_00013008-all, Ordinance 16749, purpose of erecting City Stables, 1907; SEA EWW_00013104, at SEA EWW_00013112 (9), PMA detail Report.

¹⁸ SEA EWW_00013085, Photo - 1924 fire at OCC; SEA EWW_00013086, Photo - 1924 fire at OCC.

¹⁹ SEA EWW_00010676, 44-57-1, Engineering Plan, showing Oil Station & Auto Shed, 1924; SEA EWW_00012793-all, Industrial Track Agreement between City and Northern Pacific Rail, 1924.

²⁰ SEA EWW_00012793-all, Industrial Track Agreement between City and Northern Pacific Rail, 1924.

²¹ SEA EWW_00010676, 44-57-1, Engineering Plan, showing Oil Station & Auto Shed, 1924.

²² SEA EWW_00003305, Photo – outdoor storage, 1930; Photo – Old City Light south shops, 1936

²³ SEA EWW_00002824, Photo – first delivery of copper pipe, 1935.

²⁴ SEA EWW_00002842, Photo – razing of a site building, 1936.

²⁵ Pers. Comm. w/J. Ovitt, 1/27/2022; SEA EWW_00006093, at SEA EWW_00006103 (11), Draft Supplemental Investigation Report, 2018.

warehouse, outdoor covered storage sheds, indoor storage areas, rail tracks, and outdoor storage yard.²⁶

In 1968, plans to redevelop the existing facilities and update the property were implemented.²⁷ Correspondence in 1970 indicates that structural fill was used to create the desired final grade for the completion of a new building foundation.²⁸ Treated timber piles were required to help support the floor of the new property structures.²⁹ A 1971 drawing shows the layout of the new facilities.³⁰ These facilities are discussed in more detail below.

The existing Carpentry Shop and Pipe Shop were outfitted at the south end of the new warehouse as part of the redevelopment of the property.³¹ Machinery present in the carpentry shop includes a bandsaw, table saw, planer, and a cutoff saw.³² The shop is responsible for repairs, maintenance, and remodeling work for over 100 Water Department buildings.³³ It also makes pipe cradles, repairs furniture, cuts survey stakes, mills cedar for signs, resurfaces hard woods, and cuts materials less than 4-inches thick when needed.³⁴ Concrete work, forming of reinforcing steel, and construction of barricades, traffic signs, and carriers is also done in the shop.³⁵ Crews also create wood forms to cast repairs in remote locations.³⁶ For example, crews cast a new concrete platform with oil containment raised curbs beneath a diesel generator at the Lake Youngs reservoir.³⁷

The Meter Shop is used for water meter testing and has the capability to calibrate meters of all sizes and pressures.³⁸ The Water Department contracts this testing service

²⁶ Pers. Comm. w/J. Ovitt, 1/27/2022; SEA EWW_00012666, Drawing of SPU Water OCC, 1971.

²⁷ SEA EWW_00012849-all, Letter re reconstructing shop facilities, 1968.

SEA EWW_00012849-all, Letter re new shop at Airport Way, 1968; SEA EWW_00012842, Letter re land needed for construction of new shop, 1968; SEA EWW_00012844, Letter re new shop at Airport Way, 1968; SEA EWW_00012846-all, Letter re planning a new shop, 1969; SEA EWW_00012954-all, Meeting notes re reconstruction of shops_1970; SEA EWW_00013276, at SEA EWW_00013277 (2), South Water Dept MTD Shop, 1970; Pers. Comm. w/J. Ovitt, 1/27/2022.

²⁸ SEA EWW_00012861, at SEA EWW_00012862 (2), Letter re test borings and fill, 1970.

²⁹ SEA EWW_00012810, Intra-Department Correspondence, New South Shop Facility, 1970.

³⁰ SEA EWW_00012666, Drawing of SPU Water OCC, 1971.

³¹ SEA EWW_00012815, at SEA EWW_00012816 (2), Intra-Dept Correspondence, OCC Remodel_1970.

³² SEA EWW_00012819, Intra-Dept Correspondence, Shops & Warehouse, 1970.

³³ SEA EWW_00012819, at SEA EWW_00012820 (2), Intra-Dept Correspondence, Shops & Warehouse, 1970.

³⁴ SEA EWW_00012819, at SEA EWW_00012820 (2), Intra-Dept Correspondence, Shops & Warehouse, 1970.

³⁵ SEA EWW_00012819, at SEA EWW_00012820 (2), Intra-Dept Correspondence, Shops & Warehouse, 1970.

³⁶ Pers. Comm. w/J. Ovitt, 1/27/2022.

³⁷ Pers. Comm. w/J. Ovitt, 1/27/2022.

³⁸ Pers. Comm. w/J. Ovitt, 1/27/2022.

to neighboring water utilities.³⁹ The electrical shop repairs and maintains pump equipment.⁴⁰

It is unknown when the MTD Shop began operating at the property, but it is likely the operations described below have remained the same for many years. Specific operations conducted by the MTD shop include vehicle maintenance and repair efforts of light trucks and vans, heavy trucks, and heavy equipment; vehicle painting and auto body work; vehicle fueling daily; oil storage; and operation of a lubrication stall.⁴¹ Approximately one dozen diesel rigs were stationed at the shop prior to the remodel, and continued to be maintained at this location.⁴² After the remodel, the MTD Shop began working on vehicles coming from the Water Department's North Shop (located outside the EWW boundary).⁴³ The MTD shop also includes the use of a bridge crane, welding area, tire storage area, drill press, and hoists.⁴⁴ In the early 1970s, a fuel island containing four underground storage tanks (USTs) was installed for use by the MTD shop and included one 5,200-gallon diesel fuel tank, one 500-gallon gasoline tank, one 500-gallon lube oil tank and wall-mounted oil pump, and one 500-gallon waste oil tank.⁴⁵

The OCC previously included a Machine Shop to fabricate items needed for the water system, which included making ladders and metal grates.⁴⁶ Dates for these operations are not available. Currently, these fabrication operations are contracted out.⁴⁷

A metal storage shed on the property contains a spray paint booth.⁴⁸ It is unknown when it was first constructed. In 1973, the Water Department Director of Operations requested that "a suitable building for storage of paint and inflammable items that cannot and should not be stored in our general warehouse" be designed.⁴⁹

Between 1994 and 1997, six USTs and a hydraulic hoist system were removed from the property. Three USTs (1,000-gallon, 8,000-gallon, and 2,500-gallon) contained diesel fuel, one (5,000 gallon) contained unleaded gasoline, one (500-gallon) contained oil, and one (500-gallon) contained used oil. See the response to 1.p. for additional information on USTs. The hydraulic hoist system was decommissioned and removed from the property in 1996.⁵⁰ The date the system was installed is unknown. During removal, soil

³⁹ Pers. Comm. w/J. Ovitt, 1/27/2022.

⁴⁰ Pers. Comm. w/J. Ovitt, 1/27/2022.

⁴¹ SEA EWW_00013276, at SEA EWW_00013277 (2), South Water Dept MTD Shop, 1970.

⁴² SEA EWW_00012807, Intra-Department Correspondence, MTD Building at South Shop, 1970.

⁴³ SEA EWW_00012807, Intra-Department Correspondence, MTD Building at South Shop, 1970.

⁴⁴ SEA EWW_00012807, Intra-Department Correspondence, MTD Building at South Shop, 1970; SEA EWW_00012810, at SEA EWW_00012811 (2), Intra-Department Correspondence, New South Shop Facility, 1970.

⁴⁵ SEA EWW_00012810, at SEA EWW_00012811 (2), Intra-Department Correspondence, New South Shop Facility, 1970.

⁴⁶ Pers. Comm. w/J. Ovitt, 1/27/2022.

⁴⁷ Pers. Comm. w/J. Ovitt, 1/27/2022.

⁴⁸ SEA EWW_00012801, Intra-Department Correspondence, Heat system for sprain paint booth, 1973.

⁴⁹ SEA EWW_00012801, Intra-Department Correspondence, Heat system for sprain paint booth, 1973.

⁵⁰ SEA EWW_00006093, at SEA EWW_00006093 (12), Draft Supplemental Investigation Report, 2018.

impacted with hydraulic oil was disposed of off-site. See the response to 1.i. and 1.m. for additional details regarding the hoist system.

In 1997, parcel 7666203140 was acquired for use as a parking lot.⁵¹ In 2012, an easement for the operation and ownership of a storm drain facility and appurtenances, that was relocated as part of the construction of the Central Link Light Rail System, was granted to the State of Washington from the City.⁵²

- i. Describe each release of materials at or from a Subject Property, including the type and quantity of the materials, the location of the release, the impacted media, and the response.

The City has no information on releases at the property from 1907 to 1973. Between 1973 and 2019, the following known releases have occurred at the property:

1973: Polluted stormwater was observed draining onto the property from the property to the north.⁵³ The stormwater appeared to contain oil and other non-identified waste.⁵⁴ To remedy the situation, a retaining wall was suggested to block the flow.⁵⁵

1991: An estimated 100 to 200 gallons of hydraulic fluid was released from the hydraulic hoist system in 1991.⁵⁶ In 1993, four groundwater monitoring wells were installed in the former hoist location.⁵⁷ Groundwater sampling was conducted in September 1993, January 1994, and December 1994.⁵⁸ In 1993, one sample from well MW3 detected oil-range hydrocarbons at a concentration of 4.6 mg/L, above the cleanup level of 0.5 mg/L.⁵⁹ Oil-range hydrocarbons were not detected in any other wells during the 1993 groundwater sampling event, nor in any of the four wells for the two subsequent sampling events conducted in 1994.⁶⁰ The hydraulic hoists were decommissioned and removed from the property in 1996.⁶¹ See the response to 1.m for additional details.

2008: A fire truck for SPU had a broken fuel fill line and was leaking fuel for an unknown amount of time.⁶² Booms were deployed around the spill and catch basin. There was only a slight amount of fuel in a nearby catch basin.⁶³

⁵¹ SEA EWW_00013104, at SEA EWW_00013107 (4) PMA Property Detail Report, 2021; Pers. Comm. w/J. Ovitt, 1/27/2022.

⁵² SEA EWW_00013104, at SEA EWW_00013107 (4) PMA Property Detail Report, 2021.

⁵³ SEA EWW_00012813, Intra-Department Correspondence, problem with site drainage, 1973.

⁵⁴ SEA EWW_00012813, Intra-Department Correspondence, problem with site drainage, 1973.

⁵⁵ SEA EWW_00012813, Intra-Department Correspondence, problem with site drainage, 1973.

⁵⁶ SEA EWW_00006093, at SEA EWW_00006093 (12), Draft Supplemental Investigation Report, 2018.

⁵⁷ SEA EWW_00006093, at SEA EWW_00006093 (12), Draft Supplemental Investigation Report, 2018.

⁵⁸ SEA EWW_00006093, at SEA EWW_00006093 (12), Draft Supplemental Investigation Report, 2018.

⁵⁹ SEA EWW_00006093, at SEA EWW_00006093 (12), Draft Supplemental Investigation Report, 2018.

⁶⁰ SEA EWW_00006093, at SEA EWW_00006093 (12), Draft Supplemental Investigation Report, 2018.

⁶¹ SEA EWW_00006093, at SEA EWW_00006093 (12), Draft Supplemental Investigation Report, 2018.

⁶² SEA EWW_00003513-all, Case Summary - 2700 Airport Way S, March 13, 2008.

⁶³ SEA EWW_00003513-all, Case Summary - 2700 Airport Way S, March 13, 2008.

Oil leaked from a vehicle in the parking lot.⁶⁴ The oil reached a catch basin connected to the site stormwater drainage system.⁶⁵

2010: A Jeep leaked antifreeze from the radiator.⁶⁶ Pads and booms were placed around the vehicle and nearby storm drain.⁶⁷

Two small releases of hydraulic oil to the pavement occurred.⁶⁸ The crew cleaned up the spills with on-hand materials and storm drains weren't impacted.⁶⁹

2011: An SPU vehicle had a diesel leak in the OCC east parking lot, which crews discovered after the truck drove around.⁷⁰ Crews quickly applied absorbent to affected areas and protected drains with pads.⁷¹ They also called in a vactor truck to clean out the storm drain as a precaution.⁷²

An unknown amount of hydraulic oil leaked from the back of a truck in the parking lot.⁷³ Absorbents were applied to clean up the spilled product and no material made it to the storm drain.⁷⁴

2012: Approximately 10 gallons of diesel/kerosene fuel mix spilled from a tank truck.⁷⁵ It occurred when the truck operator accidentally used the pump backwards causing fuel to come out of the trucks tank vent and pour onto Airport Way S.⁷⁶ Emerald Services was contracted to clean up all affected areas and drainage structures.⁷⁷

In November 2012, oil spilled from an employee truck in the west parking lot.⁷⁸ Catch basins nearby were pumped, and booms were placed around drains.⁷⁹ Also in

⁶⁴ SEA EWW_00003444-all, Case Summary - 2700 Airport Way S, December 9, 2008.

⁶⁵ SEA EWW_00003444-all, Case Summary - 2700 Airport Way S, December 9, 2008.

⁶⁶ SEA EWW_00007590-all, Case Summary - 2700 Airport Way S, October 4, 2010.

⁶⁷ SEA EWW_00007590-all, Case Summary - 2700 Airport Way S, October 4, 2010.

⁶⁸ SEA EWW_00007613-all, Case Summary - 2700 Airport Way S - Sep 8, 2010; SEA EWW_00007594-all, Case Summary - 2700 Airport Way S - Sep 13, 2010.

⁶⁹ SEA EWW_00007613-all, Case Summary - 2700 Airport Way S - Sep 8, 2010; SEA EWW_00007594-all, Case Summary - 2700 Airport Way S - Sep 13, 2010.

⁷⁰ SEA EWW_00006647-all, Case Summary - 2700 Airport Way S - Mar 3, 2011; SEA EWW_00006653-all, Case Summary - 2700 Airport Way S - Mar 4, 2011.

⁷¹ SEA EWW_00006647-all, Case Summary - 2700 Airport Way S -Mar 3, 2011; SEA EWW_00006653-all, Case Summary - 2700 Airport Way S - Mar 4, 2011.

⁷² SEA EWW_00006647-all, Case Summary - 2700 Airport Way S - Mar 3, 2011; SEA EWW_00006653, at SEA EWW_00006654 (2), Case Summary - 2700 Airport Way S - Mar 4, 2011.

⁷³ SEA EWW_00007362-all, Case Summary - 2700 Airport Way S - Nov 5, 2011.

⁷⁴ SEA EWW_00007362-all, Case Summary - 2700 Airport Way S - Nov 5, 2011.

⁷⁵ SEA EWW_00006661-all, Case Summary - 2700 Airport Way S - May 17, 2012.

⁷⁶ SEA EWW_00006661-all, Case Summary - 2700 Airport Way S - May 17, 2012.

⁷⁷ SEA EWW_00006661-all, Case Summary - 2700 Airport Way S - May 17, 2012.

⁷⁸ SEA EWW_00006709-all, Case Summary - 2700 Airport Way S - Nov 29, 2012.

⁷⁹ SEA EWW_00006709-all, Case Summary - 2700 Airport Way S - Nov 29, 2012.

November, a water truck leaked a small amount of hydraulic oil and possibly antifreeze in the parking lot.⁸⁰ No fluids reached the storm drain.⁸¹

2013: Fuel leaked from a vehicle in the employee parking lot.⁸² Granular absorbents were applied to all oil spill spots and pads were placed under the vehicle.⁸³ The fuel did reach a nearby storm drain.⁸⁴

Also in 2013, an employee witnessed someone dumping approximately a gallon of wash water to the ground in the parking lot.⁸⁵ No cleanup was conducted, and it is unknown if the wash water reached a storm drain.⁸⁶

2014: A Baker tank containing chlorinated water was improperly connected, causing it to overflow and discharge approximately 3000 to 5000 gallons of wastewater into the stormwater drainage system.⁸⁷

2015: Approximately 4 gallons of oil was spilled on the pavement.⁸⁸ No storm drains were impacted, and the source of the release is unknown.⁸⁹

2018: A SPU work truck released about a gallon of power steering fluid (hydraulic oil) to the ground in the OCC yard.⁹⁰ Spill pads and sawdust were placed down to collect the fluid, and no storm drains were impacted.⁹¹

In August 2018, a pole with a pole top transformer fell on southeast corner of the OCC property spilling non-PCB transformer oil.⁹² The non-PCB oil was cleaned up with absorbents and no storm drains were impacted.⁹³

In December 2018, a contractor cleaned the floors of the OCC and surveillance video showed the contractor dumping approximately 15 gallons of an unknown substance (possibly floor stripper or wax) from their machine into the curb line in the OCC yard two times.⁹⁴ Some product reached a nearby storm drain, and some was also found under a grated area by the entrance door to the staff restroom area. The spill was cleaned up

⁸⁰ SEA EWW_00006704-all, Case Summary - 2700 Airport Way S - Nov 26, 2012.

⁸¹ SEA EWW_00006704-all, Case Summary - 2700 Airport Way S - Nov 26, 2012.

⁸² SEA EWW_00006690-all, Case Summary - 2700 Airport Way S - May 29, 2013.

⁸³ SEA EWW_00006690-all, Case Summary - 2700 Airport Way S - May 29, 2013.

⁸⁴ SEA EWW_00006690-all, Case Summary - 2700 Airport Way S - May 29, 2013.

⁸⁵ SEA EWW_00003503-all, Case Summary - 2700 Airport Way S - Jun 4, 2013.

⁸⁶ SEA EWW_00003503-all, Case Summary - 2700 Airport Way S - Jun 4, 2013.

⁸⁷ SEA EWW_00003499-all, Case Summary - 2700 Airport Way S - Feb 13, 2014.

⁸⁸ SEA EWW_00006697-all, Case Summary - 2700 Airport Way S - May 7, 2015.

⁸⁹ SEA EWW_00006697-all, Case Summary - 2700 Airport Way S - May 7, 2015.

⁹⁰ SEA EWW_00003519-all, Case Summary - 2700 Airport Way S - Mar 15, 2018.

⁹¹ SEA EWW_00003519-all, Case Summary - 2700 Airport Way S - Mar 15, 2018.

⁹² SEA EWW_00003425-all, Case Summary - 2700 Airport Way S - Aug 18, 2018.

⁹³ SEA EWW_00003425-all, Case Summary - 2700 Airport Way S - Aug 18, 2018.

⁹⁴ SEA EWW_00003433-all, Case Summary - 2700 Airport Way S - Dec 8, 2018.

with on-hand cleanup spill materials.⁹⁵ Some booms and pads were placed around a nearby catch basin to prevent all the product from reaching the stormwater drainage system.⁹⁶

2019: Two car batteries fell off the back of a vehicle traveling southbound on S Forest St. The truck that lost the batteries pulled over and retrieved the batteries, but battery acid leaked to the pavement.⁹⁷ Baking soda was applied to neutralize the acid.⁹⁸ The residue was then swept up for disposal.⁹⁹

- j. Provide information on past dredging or future planned dredging in the EWOU.

The City did not dredge or arrange to have dredged any part of the East Waterway in association with the SPU Water OCC.

- k. Provide all documents pertaining to the use, storage, or disposal of any hazardous substances, pollutants, or contaminants at the Subject Property.

Responsive documents have been produced and indexed.

- l. Provide all information on electrical equipment used at the Subject Property, including transformers or other electrical equipment that may have contained polychlorinated biphenyls (PCBs).

The City has no information or documents related to electrical equipment on or at the property besides the use of PCB lighting ballasts. PCB lighting ballasts were removed and replaced over the years from the site buildings, shops, and the warehouse.¹⁰⁰

- m. Provide information on the type(s) of oils or fluids used for lubrication of machinery or other industrial purposes, and any other chemicals or products which are or may contain hazardous substances, pollutants, or contaminants which are or were used at the Subject Property.

The City has limited information on the hazardous substances or materials handled or used at the property from 1907 through the 1980s. Oil and fuel were used and handled at the site dating back to 1924.¹⁰¹

⁹⁵ SEA EWW_00003433-all, Case Summary - 2700 Airport Way S - Dec 8, 2018.

⁹⁶ SEA EWW_00003433-all, Case Summary - 2700 Airport Way S - Dec 8, 2018.

⁹⁷ SEA EWW_00006656-all, Case Summary - 2700 Airport Way S - Mar 7, 2019.

⁹⁸ SEA EWW_00006656-all, Case Summary - 2700 Airport Way S - Mar 7, 2019.

⁹⁹ SEA EWW_00006656-all, Case Summary - 2700 Airport Way S - Mar 7, 2019.

¹⁰⁰ Pers. Comm. w/S. Zand, 12/2021.

¹⁰¹ SEA EWW_00010676, 44-57-1, Engineering Plan, showing Oil Station & Auto Shed, 1924.

Records from the 1970s indicate the use of petroleum products (fuel and oil) and paint in operations at the Motor Transport Division (MTD) shop.¹⁰²

From an unknown time until 1986, herbicide was used at the property.¹⁰³

Since the 1980s, the OCC has been designated as a Small Quantity Generator of hazardous waste.¹⁰⁴ Records indicate the products and chemicals used or handled at the facility include paints (aerosol and non-aerosol), petroleum products (oils, lubricants, and diesel fuel), antifreeze, coolant, sealants, batteries, fluorescent lights, PCB light ballasts, electronic ballasts, insulating compound, floor wax, resin compounds, and cleaning products.¹⁰⁵ Waste products and chemicals are collected and disposed offsite.¹⁰⁶

From an unknown time through 1996, a hydraulic hoist system was used at the OCC.¹⁰⁷ In 1991, an estimated 100 to 200 gallons of hydraulic fluid was released from the hydraulic hoist system.¹⁰⁸ See the response to 1.i. for additional details. The hydraulic hoist system was decommissioned and removed from the property in September 1996.¹⁰⁹ Decommissioning activities included the removal of hydraulic fluid, controls, valves, piping, and lifting rams.¹¹⁰ At that time, rinsing of the concrete vaults, sumps, and ram sleeves was also done.¹¹¹ The ram sleeves were filled with concrete.¹¹² Approximately 80 to 100 tons of impacted soil were removed and disposed of offsite.¹¹³ In addition, about 2,500 gallons of rinse water, groundwater, and hydraulic fluid were removed and disposed of offsite.¹¹⁴

See the City's response to Question 1.i. for releases related to the hydraulic hoist system, and response to 1.p. for information on USTs.

¹⁰² SEA EWW_00013276, at SEA EWW_00013277 (2), South Water Dept MTD Shop, 1970; SEA EWW_00012801, Intra-Department Correspondence, Heat system for sprain paint booth, 1973.

¹⁰³ SEA EWW_00012823, Letter and profile sheet for herbicide, 1986.

¹⁰⁴ Pers. Comm. w/S. Zand, 12/2021; SEA EWW_00010739, 1986 Annual Dangerous Waste Report; SEA EWW_00010667, at SEA EWW_00010668 (2), 1985 Annual Dangerous Waste Report.

¹⁰⁵ SEA EWW_00010316, 19 Jan 2022 Obsolete items; SEA EWW_00010395, 19 Jan 2022 Pending Obsolescence; SEA EWW_00010427, 19 Jan 2022 Status Active; SEA EWW_00007975, at SEA EWW_00007984 (10), 2018 SPU SWPPP; Pers. Comm. w/S. Zand, 12/2021; SEA EWW_00010667, at SEA EWW_00010668 (2), 1985 Annual Dangerous Waste Report; SEA EWW_00010743, at SEA EWW_00010744 (2), 1987 Annual Dangerous Waste Report; SEA EWW_00010750, 1989 Annual Dangerous Waste Report; SEA EWW_00011273, at SEA EWW_00011274-275 (2-3), 1993 Annual Dangerous Waste Report; SEA EWW_00012825, at SEA EWW_00012826 (2), Letter and waste list for 2700 Airport Way, 1989.

¹⁰⁶ Pers. Comm. w/S. Zand, 12/2021.

¹⁰⁷ SEA EWW_00006093, at SEA EWW_00006093 (12), Draft Supplemental Investigation Report, 2018.

¹⁰⁸ SEA EWW_00006093, at SEA EWW_00006093 (12), Draft Supplemental Investigation Report, 2018.

¹⁰⁹ SEA EWW_00006093, at SEA EWW_00006093 (12), Draft Supplemental Investigation Report, 2018.

¹¹⁰ SEA EWW_00006093, at SEA EWW_00006093 (12), Draft Supplemental Investigation Report, 2018.

¹¹¹ SEA EWW_00006093, at SEA EWW_00006093 (12), Draft Supplemental Investigation Report, 2018.

¹¹² SEA EWW_00006093, at SEA EWW_00006093 (12), Draft Supplemental Investigation Report, 2018.

¹¹³ SEA EWW_00006093, at SEA EWW_00006093 (12), Draft Supplemental Investigation Report, 2018.

¹¹⁴ SEA EWW_00006093, at SEA EWW_00006093 (12), Draft Supplemental Investigation Report, 2018.

- n. Provide any Subject Property drainage descriptions plans or maps that include information about storm drainage which includes, but is not limited to, above or below surface piping, ditches, catch basins, manholes, and treatment/detention or related structures including outfalls. If available, also include information about connections to each sanitary sewer.

Neither stormwater nor sanitary waste discharges to the East Waterway.¹¹⁵

Stormwater Drainage

Between 1907 and 1955, it is unknown where stormwater on the property drained. The City has not located any information on storm drainage at this property between those years.

In 1955, catch basins in the parking lot were connected to storm drain lines.¹¹⁶ In 1967, additional storm drain lines were connected to the property.¹¹⁷

In 1973, stormwater was observed draining onto the OCC property from the property to the north.¹¹⁸ To remedy the situation, a retaining wall was suggested to block the flow.¹¹⁹

Currently, all stormwater at the site discharges to the Lower Duwamish Waterway via City's Diagonal SD outfall or to King County's West Point Treatment Plant.¹²⁰ Two catch basins located in the parking areas in the north portion of the property drain to King County's West Point Treatment Plant.¹²¹ An oil/water separator located in the parking lot to the west also discharges flow to the treatment plant.¹²² Catch basins are also located along Lander St and Airport Way, and outside the property buildings.¹²³ These catch basins collect stormwater and ultimately discharge to the LDW via the Diagonal outfall.¹²⁴

Sanitary Waste and Drainage

Between 1907 and 1955, it is unknown where sanitary waste at the property was stored or discharged. The City has no information regarding sanitary waste disposal at the property between those years.

¹¹⁵ City GIS, Accessed: 2/1/2022.

¹¹⁶ SEA EWW_00008222, SSC 3179-11 – Front; SEA EWW_00008221, SSC 3179-11-B – Back.

¹¹⁷ SEA EWW_00008224, SSC 3179-12 – Front; SEA EWW_00008223, SSC 3179-12-B – Back.

¹¹⁸ SEA EWW_00012813, Intra-Department Correspondence, Problem with site drainage, 1973.

¹¹⁹ SEA EWW_00012813, Intra-Department Correspondence, Problem with site drainage, 1973.

¹²⁰ SEA EWW_00008214, Drainage map, 2021; City GIS, Accessed: 2/1/2022; SEA EWW_00007975, at SEA EWW_00007997 (23), SPU SWPPP, 2018.

¹²¹ SEA EWW_00007975, at SEA EWW_00007997 (23), SPU SWPPP, 2018.

¹²² SEA EWW_00007975, at SEA EWW_00007997 (23), SPU SWPPP, 2018.

¹²³ SEA EWW_00008214, Drainage map, 2021; SEA EWW_00007975, at SEA EWW_00007997 (23), SPU SWPPP, 2018.

¹²⁴ City GIS, Accessed: 2/1/2022.

In 1955, property buildings were connected to sanitary drain lines.¹²⁵ Currently, all sanitary waste flows through a private onsite sanitary system prior to connecting to King County's main sanitary line located in S Lander Street. Sanitary waste then flows north to King County's West Point Treatment Plant.¹²⁶

- o. With respect to past activities or operations at each Subject Property, provide copies of any stormwater or drainage studies, including data from sampling, conducted at the Subject Property. Also provide copies of any Stormwater Pollution Prevention or Maintenance Plans or Spill Plans that may have been developed for different operations during Respondent's occupation of the Subject Property.

Responsive documents have been produced and indexed.

- p. Describe each underground storage tank present at any time on a Subject Property, including but not limited to the size and location of the tank, the materials stored in the tank, the time period of use, whether any material leaked from the tank, the type and quantity of leaked material, and the response to the leaked material.

Property development plans from 1924 show an oil station with a gas pump.¹²⁷ It is unknown if underground storage tanks (USTs) were associated with the gas pump. A fuel island containing four USTs was constructed sometime after 1970 and included one 5,200-gallon diesel fuel tank, one 500-gallon gasoline tank, one 500-gallon lube oil tank and wall-mounted oil pump, and one 500-gallon waste oil tank.¹²⁸

Between 1994 and 1997, six USTs were removed from the property.¹²⁹ Three USTs (1,000-gallon, 8,000-gallon, and 2,500-gallon) contained diesel fuel, one (5,000 gallon) contained unleaded gasoline, one (500-gallon) contained oil, and one (500-gallon) contained used oil.¹³⁰

Groundwater samples were collected in February 1994, December 1994, and January 1995 in the vicinity of the removed tanks.¹³¹ Diesel-range total petroleum hydrocarbons were detected at elevated concentrations at all sampling events. Impacted soil reportedly remained in place along the northern sidewall of the UST W-5 and W-6 excavations, including underneath a north-adjointing building ramp and footing, and

¹²⁵ SEA EWW_00008222, SSC 3179-11 – Front; SEA EWW_00008221, SSC 3179-11-B – Back.

¹²⁶ SEA EWW_00008214, Drainage map, 2021.

¹²⁷ SEA EWW_00010676, 44-57-1, Engineering Plan, showing Oil Station & Auto Shed, 1924.

¹²⁸ SEA EWW_00012810, at SEA EWW_00012811 (2), Intra-Department Correspondence, New South Shop Facility, 1970.

¹²⁹ SEA EWW_00006093, at SEA EWW_00006103, 105 (11, 13), Draft Supplemental Investigation Report, 2018.

¹³⁰ SEA EWW_00006093, at SEA EWW_00006103, 105 (11, 13), Draft Supplemental Investigation Report, 2018.

¹³¹ SEA EWW_00006093, at SEA EWW_00006105 (13), Draft Supplemental Investigation Report, 2018.

below the former UST locations. The UST closure report indicates that the impacted sidewall soil was "enclosed to the south with control density fill (CDF)." ¹³²

In 1997, after the removal of the storage tanks, approximately 30 tons of impacted soil and 3,700 gallons of impacted groundwater were removed from the excavation areas and disposed of off-site. ¹³³ Diesel-range and oil-range hydrocarbons were not detected in soil samples at concentrations above cleanup standards. ¹³⁴ Gasoline-range hydrocarbons were detected in one sidewall sample at a concentration of 61 mg/kg, above the soil cleanup level of 30 mg/kg. ¹³⁵ Gasoline-range hydrocarbons were also detected in waste characterization samples at 150 mg/kg and 180 mg/kg.

In 2017, supplemental investigation activities were conducted. ¹³⁶ Groundwater samples were collected and analyzed for TPH, BTEX, SVOCs, VOCs, lead, and PCBs. ¹³⁷ Groundwater samples did not contain any COCs at concentrations above cleanup levels. ¹³⁸ Soil samples were analyzed for TPH, BTEX, SVOCs, VOCs, lead, and PCBs. No COCs were detected in soil samples at concentrations above cleanup levels. ¹³⁹

- q. Provide the names and last known address of any tenants or lessees, the dates of their tenancy and a description of the activities or operations they conducted while present at the Subject Property.

The City has no information on tenants or lessees at the SPU Water OCC.

- r. If Respondent, its parent corporation, subsidiaries or other related or associated companies have filed for bankruptcy, provide:
- i. the U.S. Bankruptcy Court in which the petition was filed;
 - ii. the docket numbers of such petition;
 - iii. the date the bankruptcy petition was filed;
 - iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and
 - v. a description of the current status of the petition.

The Respondent, City of Seattle, has not filed for Bankruptcy.

¹³² SEA EWW_00006093, at SEA EWW_00006106 (14), Draft Supplemental Investigation Report, 2018.

¹³³ SEA EWW_00006093, at SEA EWW_00006106 (14), Draft Supplemental Investigation Report, 2018.

¹³⁴ SEA EWW_00006093, at SEA EWW_00006107 (15), Draft Supplemental Investigation Report, 2018.

¹³⁵ SEA EWW_00006093, at SEA EWW_00006107 (15), Draft Supplemental Investigation Report, 2018.

¹³⁶ SEA EWW_00006093, at SEA EWW_00006109 (17), Draft Supplemental Investigation Report, 2018.

¹³⁷ SEA EWW_00006093, at SEA EWW_00006110 (18), Draft Supplemental Investigation Report, 2018.

¹³⁸ SEA EWW_00006093, at SEA EWW_00006112, 115 (20, 23), Draft Supplemental Investigation Report, 2018.

¹³⁹ SEA EWW_00006093, at SEA EWW_00006112, 118, 123 (20, 26, 31), Draft Supplemental Investigation Report, 2018.

- s. If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous substances, pollutants, or contaminants, or transportation of hazardous substances, pollutants, or contaminants to or from, the Subject Property.

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